Design 1B

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REIEC

1011 S. W. Klickitat Way
Suite 207
Seattle, WA 98134-1162
(206) 624-9349
FAX (206) 624-2839

April 15, 1998

Mr. Neil Thompson
EPA Remedial Project Manager
EPA Region 10, ECL-111
1200 Sixth Avenue
Seattle, Washington 98101

RE: Confirmation of Telephone Discussion Regarding Final Capping in Design Set #1B for the Harbor Island S&G OU Superfund Site

Dear Mr. Thompson:

4/10

On behalf of the Design Set #1B Participants, I wanted to confirm the issues we discussed last week regarding remedial action capping at several of the 1B properties within the Harbor Island Soil and Groundwater Operable Unit (S&G OU) Superfund Site.

We discussed the type of asphaltic concrete pavement (ACP) that was installed on the Union Pacific Railroad (UPRR) Parcel A and Harbor Island Machine Works (HIMW) sites, and the proposed cap at the Fisher Mills (Fisher) site. We did not specifically discuss the Aspen Paints property as the cap installed there is Portland cement concrete pavement (PCCP). You further indicated that the administrative mechanism for EPA to approve these capping actions would be EPA's review and acceptance of the Remedial Action Implementation Report.

I have summarized below what we concluded for each of the ACP capping sites and how the information will be presented in the Implementation Report:

- **HIMW.** During subgrade preparation, it was discovered that the area to be paved had existing ACP that extended up to the property line fence. The soil originally sampled by EPA during the RI (samples SS-MW-02-D1 and SS-MW-02-D2) was apparently surficial soil that had sloughed onto the HIMW site through the fence from the (topographically higher) adjacent property to the west. The soil was visually obscuring the existing pavement at the fence line. This surficial soil (that caused the TPH exceedance) was excavated and temporarily stockpiled in a covered drop box, characterized and ultimately disposed of at Rabanco as a solid waste.

An area in the newly discovered existing pavement contained a large pothole which was then patched with WSDOT Class B ACP. The existing adjacent pavement now meets the definition of suitable existing pavement provided in *Section 2.1.2 - Existing Pavement Evaluation Criteria* of the RETEC document titled *Remedial Design Report Design Set #1B, Harbor Island S&G OU, August 1997*. The patched area is now suitably capped and provides a barrier to dermal contact. Ecology blocks were then placed on top of the pavement along the fence line to further prevent additional soil from the adjacent property from migrating onto HIMW property in the future.

- **UPRR.** The RI data for this site indicated a single surficial soil sample (SS-PT-54) collected from the planter box on the north side of the building contained arsenic that exceeded the capping criteria. The shrubbery in the planter was removed and the area was capped with PCCP. As a conservative measure, UPRR further desired to cap all other unpaved portions of their property. An additional area to the west was also capped, although no soil samples or data were ever generated there during the RI to indicate that capping was necessary. This additional area, which measured approximately 10 feet by 20 feet, is surrounded by suitable existing pavement on three sides and an unpaved city right-of-way to the south. It was capped with a 4-inch layer of crushed rock overlaid with a 3-inch-thick layer of WSDOT Class B ACP. The newly placed rock and asphalt provide a suitable dermal contact barrier with native soil. Remedial action capping at UPRR Parcel A has been completed in accordance with EPA requirements.

- **Fisher.** One sample (SS-FM-07) exceeded the capping criteria at this site and serves as the driver for capping in both the railroad track and parking lot areas. EPA's comments on the 30 Percent Remedial Design Report for capping in the rail areas indicated that a minimum lift of 12-inches of crushed rock would provide a suitable dermal contact barrier. Fisher is further proposing to cover the rock ballast with a layer of WSDOT Class B ACP as a working surface and to further protect the ballast layer. The ACP will vary in thickness from 3 to 5 inches and will be sloped to convey surface water into an existing network of catch basins. The parking lot adjacent to the rail area is currently paved but is lacking in integrity. It will be repaired by demolishing the existing pavement and capping it with a 3-inch lift of WSDOT Class B ACP underlaid by 4 inches of crushed rock. This area will also be sloped to convey storm water to an adjacent catch basin. This work will sufficiently cap both areas in accordance with EPA requirements. The paving work is scheduled to occur during the last week of April.

Should you have any comments or questions regarding the capping work for Design Set #1B, please feel free to call.

Sincerely,

REMEDIATION TECHNOLOGIES, INC.

Bryan W. Stone, P.E.
Project Manager

BWS:hhj

cc: R. Sadowski - AGI
D. Defaccio - HIMW
F. Frederickson - Graham & Dunn
D. Heineck - Summit Law
A. Lovely - Lovely Consulting
E. Leavitt - Port of Seattle
M. Valentine - de maximis
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